

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

IN RE

KROSCWITZ, Ronald  
KROSCWITZ, Deborah

Debtor(s)

Chapter 13

Case No. 14-14681-FJB

**TRUSTEE'S OBJECTION TO CONFIRMATION OF THE DEBTOR'S CHAPTER 13  
PLAN**

Now comes Carolyn Bankowski, Standing Chapter 13 Trustee, and respectfully objects to the confirmation of the Debtor's Chapter 13 Plan (the "Plan"), and for reasons therefore says as follows:

1. The Debtors commenced this case by filing a petition on October 3, 2014.
2. On December 3, 2014, the Trustee presided over a 341 meeting of creditors and examined the Debtors.
3. On April 23, 2015, the Debtors filed the Plan. The Trustee cannot recommend the Plan for confirmation at this time.
4. The Plan proposes monthly plan payment in the sum of \$2,089.00 per month over a term of 60 months. According to Schedules I and J, the Debtors have projected disposable income in the sum of \$1,086.05 which is not sufficient to fund the plan.

**WHEREFORE** the Chapter 13 Trustee respectfully requests that the Court sustain her objection to confirmation, and for such other relief as is appropriate.

Dated: 5/22/15

Respectfully submitted,

By: /s/ Carolyn Bankowski  
Carolyn Bankowski, BBO#631056  
Patricia A. Remer, BBO#639594  
Standing Chapter 13 Trustee  
PO Box 8250  
Boston, MA 02114  
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**Certificate of Service**

The undersigned hereby certifies that on 5/22/15, a copy of the Trustee's Objection to Debtor's Chapter 13 Plan was served via first class mail, postage prepaid or by electronic notice on the debtor and debtor's counsel at the addresses set forth below.

Ronald and Deborah Kroschwitz  
48 Main Street  
Byfield, MA 01922

Ira Grohlam, Esquire  
321 Columbus Ave.  
Boston, MA 02116

/s/ Carolyn Bankowski